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*Attorneys for Defendant  
St. Joseph Transitional Rehabilitation  
Center, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ELIZABETH KENNEDY, MERCY  
VISMANOS, and ARIANA SANCHEZ,

Plaintiffs,

vs.

ST. JOSEPH TRANSITIONAL  
REHABILITATION CENTER, LLC, DOES  
1-50, inclusive and ROE CORPORATIONS 1-  
50, inclusive,

Defendants.

Case No. 2:20-cv-02017-APG-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR PARTIES  
TO FILE REQUEST FOR DISMISSAL**

(First Request)

Defendant St. Joseph Transitional Rehabilitation Center, LLC (“Defendant”) by and through its counsel, Jackson Lewis P.C., and Plaintiffs Elizabeth Kennedy, Mercy Vismanos and Ariana Sanchez (“Plaintiffs”) by and through their counsel, HKM Employment Attorneys LLP, hereby stipulate and agree to extend the time for the Parties to file a Request for Dismissal in this case that was settled at the Early Neutral Evaluation (“ENE”) conference on February 24, 2021.

The parties worked diligently to prepare a formal written settlement agreement following the ENE, to obtain signatures of all parties, and to prepare multiple settlement checks. Defense counsel is informed that all settlement checks will be ready on Monday, March 29, 2021, and thereafter, Defense Counsel will promptly deliver them to Plaintiffs’ counsel. Thereafter the parties will file a Request for Dismissal. However, the parties do not anticipate they will be able

1 to complete all these items on one day, Monday, March 29, 2021, in order to submit the Request  
2 for Dismissal consistent with the Court's Order. (ECF No. 22).

3 The parties stipulate and request a one-week extension of the deadline to file the Request  
4 for Dismissal, no later than Monday, April 5, 2021.

5 This stipulation and order is sought in good faith and not for the purpose of delay. No  
6 prior request for extension of time has been made.

7 Dated this 29<sup>th</sup> of March, 2021.

8 HKM EMPLOYMENT ATTORNEYS LLP JACKSON LEWIS P.C.

9 /s/ Dana Sniegocki

10 Jenny L. Foley, Ph.D., Esq., Bar No. 9017  
11 Dana Sniegocki, Esq., Bar No. 11715  
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Las Vegas, Nevada 89104  
The District at Green Valley Ranch

13 *Attorneys for Plaintiffs*

/s/ Deverie J. Christensen

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St. Joseph Transitional Rehabilitation  
Center, LLC*

14  
15 **ORDER**

16 **IT IS SO ORDERED:**

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18 Dated: March 29, 2021

19   
20 U.S. DISTRICT COURT JUDGE

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22 4832-6927-3314, v. 1  
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